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March 31, 2011

VIA ECF

The Honorable Robert M. Levy, U.S.M.J.
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kraft As Trustee For Marilyn Mandel Irrevoc. Trust v. Lincoln Benefit Life Co.,
Docket No. 10 CV 2018 (JG) (RML) (E.D.N.Y.)

Dear Judge Levy:

This firm represents defendant Lincoln Benefit Life Company ("Lincoln Benefit") in the above-referenced action. On behalf of both parties, I submit this joint status letter, pursuant to Your Honor's January 14, 2011 Order, which extended the deadlines for, among others, fact discovery and dispositive motions to July 29, 2011 and August 29, 2011, respectively.

The parties are still in the thick of discovery and they intend to conduct depositions in the next 3 months, including Lincoln Benefit's 30(b)(6) witness, Plaintiff, Third-Party Defendant Chaim Muskat ("Muskat"), as well a few non-party witnesses. To the extent there are discovery issues and deficiencies, the parties will make good faith effort to resolve such issues, and we hope that the Court's involvement will not be necessary. The parties, nevertheless, reserve their right to seek the Court's assistance in resolving all discovery issues.

With respect to Lincoln Benefit's Third-Party Complaint against Muskat, the deadline for Lincoln Benefit to respond to Muskat's Answer and Counterclaim is April 4, 2011.

We are available to discuss this or any other issues with the Court, either before or at the May 26 status conference.

ATLANTA BOSTON CHICAGO HOUSTON LOS ANGELES NEW YORK SAN FRANCISCO SACRAMENTO WASHINGTON, D.C. BRUSSELS



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On behalf of both parties, we thank the Court for its consideration.

Respectfully submitted,

SEYFARTH SHAW LLP

Jay W. Cho

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